Identify Total Pool of Time Study Moments

The total pool of "moments" within the time study is represented by calculating the number of working days in the sample period, times the number of work hours of each day, times the number of minutes per hour, and times the number of participants within the time study. The total pool of moments for the quarter is reduced by the exclusion of weekends, holidays and hours during which employees are not scheduled to work.

Randomly Select Moments and Randomly Match Each Moment to a Participant

Once compiled, each cost pool is sampled to identify participants in the RMTS time study. The sample is selected from each cost pool, along with the total number of eligible time study moments for the quarter. Using a statistically valid random sampling technique, the desired number of random moments is selected from the total pool of moments. Next, each randomly selected moment is matched up, using a statistically valid random sampling technique, with an individual from the total pool of participants.

Each time the selection of a minute and the selection of a name occurs, both the minute and the name are returned to the overall sample pool to be available for selection again. In other words, the random selection process is done with replacement so that each minute and each person are available to be selected each time a selection occurs. This step guarantees the randomness of the selection process.

Each selected moment is defined as a specific one-minute unit of a specific day from the total pool of time study moments and is assigned to a specific time study participant. Each moment selected from the pool is included in the time study and coded according to the documentation submitted by the employee.

The sampling period is defined as the three-month period comprising each quarter of the Calendar Year calendar. The following are the quarters followed for the SBAC program:

- Quarter 1 = January 1 March 31
- Ouarter 2 = April 1 June 30
- Quarter 3 = July 1 September 30
- Quarter 4 = October 1 December 31

The sampling periods are designed to be in accordance with the May 2003 Medicaid School-Based Administrative Claiming Guide, on page 42, Example 4, specifically:

"If the school year ends in the middle of a calendar quarter (for example, sometime in June), the last time study for the school year should include all days through the end of the school year. Therefore, if the school year ends June 25th, then all days through and including June 25th must be included among the potential days to be chosen for the time study."

Each quarter, dates that school districts will be in session and for which their staff members are compensated will be identified. District staff members are paid to work during those dates that districts are in session; as an example, districts may end the school year sometime in May each year. All days including and through the end of the school year would be included in the potential days to be chosen for the time study. It is important to understand that although districts may end the school year prior to the close of the quarter staff members are paid for services provided through the end of the federal fiscal quarter. Districts typically spread staff compensation over the entire calendar year even when staff members are not working. The district considers this compensation reimbursement for time when staff members actually work rather than compensation for the staff members time off during the summer months.

The majority of LEA staff work during a traditional school year. Since the time study results captured during a traditional time study are reflective of any other activities that would be performed during the summer quarter, a summer quarter time study will not be conducted. Kentucky will use an average of

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the three (3) previous quarter's time study results to calculate a claim for the July-September period. This is in accordance with the May 2003 Medicaid School-Based Administrative Claiming Guide, page 42. Specifically:

"...the results of the time studies performed during the regular school year would be applied to allocate the associated salary costs paid during the summer. In general, this is acceptable if administrative activities are not actually performed during the summer break, but salaries (reflecting activities performed during the regular school year) are prorated over the year and paid during the summer break."

Notify Participants about their Selected Moments

Email is the standard method by which time study participants are notified of their requirement to participate in the time study and of their sampled moment. Sampled participants will be notified of their sampled moment no more than five (5) days prior to the sampled moment. At the prescribed moment, each sampled participant is asked to record and submit his/her activity for that particular moment. Additionally, if the moment is not completed the participant receives a late notification email 24 hours after their selected moments. Throughout this entire process, the district's LEA coordinators have real-time access in the online system to view their sampled staff, the dates/times of their sampled staff's moments, and whether or not the moment has been completed. Moments close after 10 school days, which means participants will not be able to complete their moment after that time. As explained on page 13, if the return rate of valid moments is less than 85% then, non-returned moments will be included and coded as non-allowable code until an 85% compliance rate is obtained

Compliance reports are ran weekly by the RMTS administrator and sent to the districts. The school districts also have the ability to run compliance reports on a daily basis. A validity check of the time study results is completed each quarter prior to the calculation of the claim. The validity check ensures that the minimum number of responses is received each quarter to meet the required confidence level. The number of completed and returned time study moments is analyzed to confirm that the confidence level requirements have been met. Once the validity of the sample has been confirmed, the time study results are calculated and prepared for the calculation of the quarterly claim.

At the end of each quarter, once all random moment data has been received and time study results have been calculated, statistical compliance reports will be generated to serve as documentation that the sample results have met the necessary statistical requirements.

Training Types & Overview

LEA Coordinator Training (RMTS)

DMS will review and approve all RMTS training material used by the KDE contractor. Once the training material has been approved by DMS, the LEA contractor will provide initial training for the LEA coordinators, which will include an overview of the RMTS software system and information on how to access and input information into said system. It is essential for the LEA coordinators to understand the purpose of the time studies, the appropriate completion of the RMTS, the timeframes and deadlines for participation, and that their role is crucial to the success of the program. Participants are to be provided detailed information and instructions for completing and submitting the time study documentation of the sampled moment. All training materials will be accessible to LEA coordinators. In addition, annual training will be provided to the LEA coordinators to cover topics such as SBAC program updates, process modifications and compliance issues.

Central Coding Staff Training (Activity Coding)

Central coders are employed by the contractor and will review the documentation of participant activities

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performed during the selected moments and determine the appropriate activity code. In a situation when insufficient information is provided to determine the appropriate activity code, the central coder will contact the individual LEA and request submission of additional information about the moment. Once the information is received the moment will be coded and included in the final time study percentage calculation. The moments and the assigned codes will be reviewed for consistency and adherence to the state approved activity codes.

Sampled Staff Training

The LEA coordinator for each LEA must ensure sampled staff receives training prior to the completion of the RMTS for his/her sampled moment. Beginning with the October 2008 Quarter, training will be incorporated into the moment documentation system so sampled staff will have to review the information prior to documentation of the sampled moment. Since all RMTS responses will be reviewed by central coders, and these coders will subsequently select the appropriate activity code, the staff training will focus on program requirements and the completion of the RMTS survey. The staff training will not include an overview of activity codes since all coding will be completed by central coders. The following items must be included in staff training:

- Overview of the required process to participate in RMTS
- Review the standards for RMTS documentation submitted by staff
- Methods for requesting additional documentation from time study participants when insufficient information is provided to centralized coders to determine the appropriate activity code.
- The training must be provided quarterly, staff that has not received training can not participate in the RMTS.
- It is required that any training materials used by LEAs be submitted for review and comment to DMS and KDE.
- LEAs are encouraged to use and distribute any materials provided by the state regarding the time study.

Documentation (RMTS)

All documentation of sampled moments must be sufficient to provide answers to the time study questions needed for accurate coding:

- Who was with you?
- What were you doing?
- Why were you performing this activity?
- Was this activity covered in an IEP?
- In addition, sampled staff will certify the accuracy of their response prior to submission—

Time study participants certify the accuracy of his/her response prior to submission.

Additional documentation maintained by the LEA contractor includes:

- Sampling and selection methods used,
- Identification of the moment being sampled, and
- Timeliness of the submitted time study moment documentation.

Invalid moments are moments not returned by the LEA.

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Time Study Return Compliance

DMS will require an 85% compliance response rate. Moments not returned or not accurately completed and subsequently resubmitted by the school district will not be included in the database unless the return rate for valid moments is less than 85%. If the return rate of valid moments is less than 85% then, non-returned moments will be included and coded as a non-allowable code until an 85% compliance rate is obtained. To ensure that enough moments are received to have a statistically valid sample, Kentucky should over sample at a minimum of fifteen percent (15%) more moments than needed for a valid sample size. LEAs must submit completed moments 10 school days after the sampled moment has passed. To assure that districts are properly returning sample moments, the district's return percentage for each quarter will be analyzed. If a district has non-returns greater than 15% moments for a quarter, the district will receive a warning letter. DMS and KDE will be copied on all warning letters sent to the districts. If the same district is in default the next quarter after being warned, they will not be able to participate for a one year period of time.

For instance, if a district has non-returns greater than 15% moments for the quarter ended December 31, 2006 and March 31, 2007, the district will not be able to submit claims for the Federal Fiscal Year ending September 30, 2007.

Time Study Activities/Codes

The time study codes are assigned indicators that determine its allowability, federal financial participation (FFP) rate, and Medicaid share. A code may have one or more indicators associated with it. These indicators should not be provided to time study participants.

The time study code indicators are:

| Application of FFP rate | 50 percent | Refers to an activity that is allowable as administration under the Medicaid program and claimable at the 50 percent non-enhanced FFP rate. |
|--|------------|--|
| Allowability & Application of Medicaid Share | U | Unallowable – refers to an activity that is unallowable as administration under the Medicaid program. This is regardless of whether or not the population served includes Medicaid eligible individuals. |
| | TM | Total Medicaid – refers to an activity that is 100 percent allowable as administration under the Medicaid program. |
| | PM | Proportional Medicaid – refers to an activity, which is allowable as Medicaid administration under the Medicaid program, but for which the allocable share of costs must be determined by the application of the proportional Medicaid share (the Medicaid eligibility rate). The Medicaid share is determined as the ratio of Medicaid eligible students to total students. |
| | R | Reallocated – refers to those general administrative activities which must be reallocated across the other activity codes on a pro rata basis. These reallocated activities are reported under Code 10, General Administration. |

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The following time study codes are to be used for the Random Moment Time Study:

| Code | Activity | SBAC Indicator(s) |
|------|--|-------------------|
| 1.a | Non-Medicaid Outreach | U |
| 1.b | Medicaid Outreach | TM/50% |
| 2.a | Facilitating Non-Medicaid Eligibility | U |
| 2.b | Facilitating Medicaid Eligibility Determination | TM/50% |
| 3 | School Related & Educational Activities | U |
| 4.a | Direct Medical Services – Not Covered as IDEA/IEP Service | |
| 4.b | Direct Medical Services – Covered as IDEA/IEP Service | |
| 5.a | Transportation Non-Medicaid | U |
| 5.b | Medicaid Transportation | PM/50% |
| 6.a | Non-Medicaid Translation | U |
| 6.b | Medicaid Translation | 50% |
| | Program Planning, Development and Interagency Coordination Non- | U |
| 7.a | Medical | |
| 7.b | Program Planning, Development and Interagency Coordination Medical | PM/50% |
| 8.a | Non-Medical/Non-Medicaid related Training | U |
| 8.b | Medical/Medicaid related Training | PM/50% |
| 9.a | Referral, Coordination, and Monitoring Non-Medicaid Services | U |
| 9.b | Referral, Coordination, and Monitoring of Medicaid Services | PM/50% |
| 10 | General Administration | R |
| 11 | Not Paid/Not Worked | U |

These activity codes represent administrative and direct service activity categories that are used to code all categories of claims. For all activity codes and examples, if an activity is provided as part of, or an extension of, a direct medical service, it may not be claimed as Medicaid Administration. The detail code definitions and examples may be found in Appendix A.

Submitting a Claim for Medicaid Administration

The SBAC Program cost calculation has five components:

- Cost pool construction
- Allowable Medicaid administrative time
- The Medicaid Enrollment Rate (MER)
- The FFP
- Indirect cost rate (ICR)

Calculating the Claim

In very general terms, the federal share of the claim for Medicaid administration is calculated by:

Cost Pool Total % time claimable to Medicaid administration

Multiplied by Multiplied by

The Medicaid Enrollment Rate (MER) (where applicable)
1 + Indirect Cost Rate (this percent is added to the value of the calculation at this stage in the process)
equals the amounts of the claim request
% FFP (50%)

Multiplied by
Multiplied by

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a) Cost pools

Cost pools have previously been explained

b) % Time Claimable to Medicaid Administration

The time study results are utilized to determine the amount or percent of time spent by school district personnel doing the identified outreach, care and coordination functions.

c) The Medicaid Enrollment Rate (MER)

The amount of the claim is affected by the MER. This factor is a critical component of the claim. MER data consist of eligibility information using the first and last month of the quarter to which it relates.

d) Federal Financial Participation (FFP) Rate

After the results of the time study are multiplied by the cost pool total, they are then multiplied by the 50% FFP

e) Indirect Cost Rate (ICR)

Indirect costs will be claimed as a part of the SBAC Program. The State will use a consistent method to calculate the unrestricted ICR as outlined in OMB Circular A-87. Claims for the school district's indirect costs are only allowable when the entity has an approved indirect cost rate.

SBAC Claim Development

The administrating contractor will submit quarterly claims on behalf of participating LEAs directly to KDE. KDE will forward the claims to DMS for review and approval for payment processing. The claims will be based on the quarterly costs, the time study, the Medicaid eligibility rate, the indirect cost rate (ICR) and the FFP.

SBAC Medicaid Eligibility Rate (MER)

The costs associated with several Medicaid administrative activities performed by school districts must be adjusted by the district's Medicaid eligibility rate. The Medicaid Eligibility Rate (MER) reduces these counts to the amount for services specific to Medicaid eligible individuals. For example, referring an individual student to a Medicaid provider in the community is allowable only to the extent that the student is Medicaid eligible. The counts of these activities are claimable as administrative activities but only to the extent that they are directed toward the Medicaid eligible population.

The Kentucky public school system is comprised of 176 school districts including the School for the Blind and the School for the Deaf located within 120 counties. To determine the MER for each participating school district, Kentucky will use two methods of calculations. These quarterly calculations utilize the following reports:

- A countywide report of all Medicaid eligibles ages 5-18 provided by the Department of Medicaid. This report provides just the number of eligibles.
- DMS also provides a master detail listing of all Medicaid eligible's ages 5-18 which include the name, date of birth and social security number of each of the Medicaid participants residing in each of the participating school district counties.

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- A school district report of all enrolled students between the ages of 5-18. This report is generated by the statewide enrollment reporting database. The report lists the student name, date of birth, and social security number.
- The end of the school year enrollment report submitted by each individual school district.

To calculate the MER for participating school districts where there is only one school district located in the county. The MER is determined by dividing the DMS countywide report by the school district's year end total enrollment.

To calculate the MER for participating school districts where there are multiple school districts located in the same county. The KDE performs a computerized match where the district generated student list is compared to the DMS master list. The MER is determined by dividing the number of Medicaid eligible matches by the end of the school year enrollment.

Financial Data

The financial data to be included in the calculation of the SBAC claim are to be based on actual expenditures incurred during the quarter. These costs must be obtained from actual detailed expenditure reports generated by the provider's financial accounting system.

OMB Circular A-87 specifically defines the types of costs: direct costs, indirect costs and allocable costs that can be included in the program. Sections 1 through 42 provide principles to be applied in establishing the allowability or unallowability of certain items of cost. These principles apply whether a cost is treated as direct or indirect. The following items are considered allowable costs as defined and cited below by A-87.

Direct Costs

Typical direct costs identified in A-87 include:

- Compensation of employees
- Cost of materials acquired, consumed, or expended
- Equipment
- Travel expenses incurred

Indirect Costs

Indirect costs included in the claim are computed by multiplying the costs by the LEAs' approved unrestricted indirect cost rate. These indirect rates are developed by the LEAs' state cognizant agency, Kentucky Department of Education (KDE), and are updated annually. The methodology used by the respective state cognizant agency to develop the indirect rates has been approved by the cognizant federal agency, as required by the CMS guide. Indirect costs are included in the claim as reallocated costs.

DMS will ensure that costs included in the SBAC financial data are not included in the district's unrestricted indirect cost rate, and no costs will be accounted for more than once.

Unallowable Costs

Costs that may not be included in the claim are:

Direct costs related to staff that are not identified as eligible time study participants (i.e., costs related to teachers, cafeteria, transportation, and all other non-School Based administrative areas)

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Costs that are paid with 100 percent federal funds Any costs that have already been fully paid by other revenue sources (federal, state/federal, recoveries, etc.)

Revenue Offset

Expenditures included in the SBAC claim are often funded with several sources of revenue. Some of these revenue sources require that expenditures be offset, or reduced, prior to determining the federal share reimbursable by Medicaid. These "recognized" revenue sources requiring an offset of expenditures are:

- Federal funds (both directly received by the district and pass through from state or local agencies)
- State expenditures that have been matched with federal funds (including FFS). Both the state and federal share must be used in the offset of expenditures.
- Third party recoveries and other insurance recoveries Claim Certification

LEAs will only be reimbursed the federal share of any SBAC billings. The Chief Financial Officer (CFO), Chief Executive Officer (CEO), Executive Director (ED), Superintendent (SI) or other individual designated as the financial contact by the LEA will be required to certify the accuracy of the submitted claim and the availability of matching funds necessary. The certification statement will be included as part of the invoice and will meet the requirements of 42 CFR 433.51.

LEAs will be required to maintain documentation that appropriately identifies the certified funds used for SBAC claiming. The documentation must also clearly illustrate that the funds used for certification have not been used to match other federal funds. Failure to appropriately document the certified funds could result in non-payment of claims.

Direct Service or Fee for Service (FFS) Medicaid Eligibility Rate

The direct service Medicaid eligibility rate will be calculated annually for each school district. The numerator will be the number of Medicaid IEP students who received a direct medical service and the denominator will be the total IEP students who received the direct medical service. The MER for Direct Service is calculated for each school district. The MER for Direct Service is calculated annually following the end of the state fiscal year.

The SBS eligibility rate calculation is:

[Number of Medicaid Students with IEP]
[Total Number of Students with IEP]

Documentation & Recordkeeping Requirements

It is required that all SBAC LEAs maintain documentation supporting the administrative claim. The LEAs must maintain and have available upon request by state or federal entities the contract with the state to participate in the SBAC program. Some documentation must be maintained quarterly. This information must be available upon request by state or federal entities. The quarterly requirements are outlined below.

Each participating LEA will maintain a quarterly audit file containing, at a minimum, the following information:

- A roster of eligible individuals, by category, submitted for inclusion in the participant sample pool
- Verification of compliance with training requirements by time study participants
- Financial data used to develop the expenditures and revenues for the claim calculations including state/local match used for certification

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- Documentation of the district's approved indirect rate (if applicable)
- A copy of the completed and signed certification form

The State requires LEAs to maintain complete copies of all SBAC claims and supporting documentation including time study results.

Retention period

Documentation must be retained for the minimum federally required time period. Federal guidelines (42 CFR 433.32) state the retention period is three years unless there is an outstanding audit. The state's requirement is for LEAs to maintain the administrative claiming documentation for five years or until such time all outstanding audit issues and/or exceptions are resolved.

Oversight and Monitoring

Federal guidelines require the oversight and monitoring of the administrative claiming programs. This oversight and monitoring must be done at both the LEA and state level.

State Level Oversight and Monitoring

The state is charged with performing appropriate oversight and monitoring of the time study and SBAC program to ensure compliance with state and federal guidelines. DMS is the responsible agency for this required monitoring and oversight effort. DMS has a Memorandum of Agreement (MOA) with KDE Medicaid administrative claiming. The MOA clearly state all parties' responsibilities. Please see MOA attached as Appendix C .

DMS will monitor and review various components of the SBAC program operating in the state. The areas of review include, but are not limited to,

- Participant List ensure only eligible categories of staff are reported on the participant list based on the approved RMTS categories in the implementation plan.
- RMTS Time Study sampling methodology, the sample, and time study results
- RMTS Central Coding review at a minimum a 5% sample per quarter of the completed coding
- Training Compliance with training requirements: program contact, central coder and district staff
- Financial Reporting Costs are only reported for eligible cost categories and meet reporting requirements.
- Documentation compliance

Frequency

All LEAs will be monitored at least once every three (3) years. This monitoring will consist of either an on-site, desk, or combination review. For this monitoring process, one quarter will be selected for in-depth review. Participating LEAs will be required to fully cooperate in providing information and access to necessary staff in a timely manner to facilitate these efforts. LEAs that do not fully cooperate in the review process may be subject to sanctions.

For other quarters, trends will be examined, for example, total costs in the claim, time study results, and reimbursement levels. Any significant variations from historical trending will be communicated to the LEAs for explanation of the variance.

KDE is in constant communication with the vendor, often daily, to discuss any issues that may arise. KDE will set up regular meetings and/or conference calls, (at least monthly) with their contractor and DMS to discuss time study trends, 85% LEA compliance level, coding and any other SBAC or time study issues, etc.

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The state will pursue remedial action for LEAs that fail to meet SBAC program requirements or fail to correct problems identified during review. Examples of actions that will cause implementation of sanctions include, but are not limited to:

- Repeated and/or uncorrected errors in financial reporting, including failure to use the Contractor provided financial reporting worksheets
- Failure to cooperate with state and/or federal staff during reviews or other requests for information
- Failure to maintain adequate documentation
- Failure to provide accurate and timely information to the Contractor as required

Sanctions the state may impose include suspending payment of SBAC claims, conducting more frequent reviews, and the recoupment of funds.

Contractor Level Oversight and Monitoring

Quarterly Tasks

Training regarding RMTS

- Ensure district has participated in required RMTS training in order to participate in RMTS
- Review of RMTS compliance rate, ensure each district meets the 85% compliance level requirement
- Ensure LEA coordinator understands how critical response rate is per district and that he/she is aware of applicable sanctions for non-compliance.

Roster Updates

- Prepare roster update and email to district contact
- Receive updated roster from district
- Review and QC updated roster
- Upload individual district rosters into database with all other participating districts

Time Study Tasks

- Randomly select time study participants from database
- Notify district contact of staff from their district who were selected for the quarter
- Notify selected participants within 5 days prior and 1 day prior to their selected moment and send reminders one day after the moment if it has not been completed with a copy to the supervisor and/or district coordinator.
- Review documented responses and code time study received from selected participants. Conduct follow-up if necessary for the determination of the appropriate time study code.
- Quality Check received and coded time study data
- Follow up with participants who submitted incomplete data, correcting the data so it can be used.
- Scan all data and prepare it for the claim.

Financial Tasks

- Conduct financial training with district, as needed
- Prepare quarterly financial workbook and email workbook to designated financial contact.
- Receive completed workbook and QC for errors
- If necessary, resubmit to contact for revisions

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- Prepare financial information for the SBAC claim
- Prepare Certification of Public Expenditure (CPE) form and send to financial contact for completion.
- Receive completed CPE forms from district and submit to KDE

Miscellaneous Tasks

- Participate in quarterly SBAC update meetings
- Answer general questions form district throughout the quarter
- Collect annual indirect cost rate (ICR) from district
- Obtain quarterly Medicaid Eligibility Rate (MER) from the State
- Obtain quarterly IEP Ratio from the State
- Run quarterly SBAC claim and submit to KDE
- Send copy of claim to district for their records
- Follow up with KDE to ensure district receives payment
- Conduct quality assurance reviews, as needed
- Serve as liaison between district and DMS and KDE

Local LEA Level Oversight and Monitoring

Each LEA participating in the SBAC program must take appropriate oversight and monitoring actions that will ensure compliance with SBAC program requirements.

Actions must be taken to ensure, at a minimum, that:

- The time study is performed correctly
- The time study results are valid
- The financial data submitted is true and correct
- RMTS training requirements are met
- Appropriate documentation is maintained to support the time study and the claim

Required Personnel

Each LEA must designate an employee as the LEA coordinator or SBAC program contact. This single individual is designated within the LEA to provide oversight for the implementation of the time study and to ensure that policy decisions are implemented appropriately. The LEA must also designate an Assistant LEA coordinator to provide back-up support for time study responsibilities.

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School Based Administrative Claiming Time Study Codes Effective October 2007

Listed below are 19 codes to be used when performing time studies for both SBAC and Direct Services.

| CODE 1.a. | Non-Medicaid Outreach |
|-----------|---|
| CODE 1.b. | Medicaid Outreach |
| CODE 2.a. | Facilitating Application to NON-Medicaid Program |
| CODE 2.b. | Facilitating Medicaid Eligibility Determinations |
| CODE 3 | School Related and Educational Activities |
| CODE 4.a. | Direct Medical Services – Not Covered as IDEA/IEP Service |
| CODE 4.b. | Direct Medical Services – Covered as IDEA/IEP Service |
| CODE 5.a. | Transportation for Non-Medicaid Services |
| CODE 5.b. | Transportation-Related Activities in Support of Medicaid Covered Services |
| CODE 6.a. | Non-Medicaid Translation |
| CODE 6.b. | Translation Related to Medicaid Services |
| CODE 7.a. | Program Planning, Policy Development and Interagency Coordination Related to NON-Medical Services |
| CODE 7.b. | Program Planning, Policy Development, and Interagency Related to Medical Services |
| CODE 8.a. | Non-Medical/Non-Medicaid Related Training |
| CODE 8.b. | Medical/Medicaid Related Training |
| CODE 9.a. | Referral, Coordination and Monitoring of Non-Medicaid Services |
| CODE 9.b. | Referral, Coordination and Monitoring of Medicaid Services |
| CODE 10 | General Administration |
| CODE 11 | Non Paid, Non Work |

These activity codes represent administrative and direct service activity categories that are used in the school setting. For all the activity codes and examples listed below, if an activity is provided as part of, or an extension of, a direct medical service, it may not be claimed as School Based administration. Any costs related to medical services should be claimed as Code 4.a, Direct Services Service – Not Covered as IDEA/IEP Service or Code 4.b., Direct Medical Service – Covered as IDEA/IEP Service.

CODE 1.a. Non-Medicaid Outreach (All Staff) - U

This code should be selected when school staff is performing activities that inform individuals about their eligibility for non-Medicaid social, vocational and educational programs (including special education) and

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